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FILED
DISTRICT COURT OF GUAM

AUG 27 2007

JEANNE G. QUINATA
Clerk of Court

4 *Attorneys for the Estate of*
5 *Roland Anthony Boudreau, Deceased*

7 IN THE DISTRICT COURT OF GUAM

8 -----
9 CASSANDRA CHAU TRUONG,)
Administratrix of the Estate of)
10 ROLAND ANTHONY BOUDREAU,)
deceased,)

11 Plaintiff,)

12 vs.)

13 UNITED STATES OF AMERICA,)

14 Defendant.)

CIVIL CASE NO. 06-00022

PLAINTIFF'S OBJECTION AND
RESPONSE TO DEFENDANT'S
SUBPOENA DUCES TECUM

15 -----
16 **To: Defendant and its Attorneys of Record, U.S. Attorney's Office, District of Guam**
17 **and the Northern Mariana Islands**

18 Plaintiff, Cassandra Chau Truong, Administratrix of the Estate of Roland Anthony Boudreau,
19 deceased, submits her Objection and Response to Defendant's Subpoena Duces Tecum in the above
20 captioned and styled case.

21 **TEKER TORRES & TEKER, P.C.**

22 By

JOSEPH C. RAZZANO, ESQ.
Attorney's for Plaintiff

23 Dated: August 27, 2007.

ORIGINAL

1 **OBJECTION AND RESPONSE TO SUBPOENA DUCES TECUM**

2 1. Any and all documents which help form the basis of your claim that the United States
3 was in any way responsible or negligent.

4 **Answer:** Plaintiff objects to Defendant's wholesale request to produce "any and all" written
5 documents pertaining to any claim asserted. The Federal Rules of Civil Procedure permit discovery
6 of designated documents, papers, etc. The rules do not permit a general inspection of an adversary's
7 records, as this constitutes nothing more than a fishing expedition. Defendant's request is too
8 general. What the Defendant is seeking is authorization to conduct a general search of Plaintiff's
9 files, and this is not permitted under the Federal Rules of Civil Procedure.